

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

|  |   |                          |
|--|---|--------------------------|
| IN RE:                                   | ) |                          |
|  | ) | Case No. 19-20486 TPA    |
| Gary L. Fleming, Sr. aka Gary L. Fleming | ) |                          |
| dba Gary L. Fleming CLU & Associates     | ) |                          |
| dba Fleming Financial Services           | ) |                          |
|  | ) | Chapter 11               |
| Debtor                                   | ) | Related to Docket No. 52 |
|  | ) |                          |
| Toyota Lease Trust,                      | ) |                          |
|  | ) |                          |
| Movant                                   | ) |                          |
|  | ) |                          |
| vs.                                      | ) |                          |
|  | ) |                          |
| Gary L. Fleming, Sr. aka Gary L. Fleming | ) |                          |
| dba Gary L. Fleming CLU & Associates     | ) |                          |
| dba Fleming Financial Services           | ) |                          |
|  | ) |                          |
| Respondent                               | ) |                          |

**RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, comes the Debtor, Gary L. Fleming, Sr., by and through his attorney Christopher M. Frye, and Steidl and Steinberg, Attorneys at Law, and respectfully responds to the Motion for Relief from the Automatic Stay as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted by way of further answer. The Debtor was in default as of the date of the filing of the bankruptcy case. The Debtor is current on post-petition payments.

6. Admitted.
7. Denied. The Debtor believes that he is current on post-petition payments.
8. The Debtor is without sufficient information to confirm or deny this statement.
9. The Debtor is without sufficient information to confirm or deny this statement.
10. The Debtor is without sufficient information to confirm or deny this statement.
11. Denied. This leased vehicle is the only vehicle that the Debtor has the ability to use in day to day business. Without this vehicle, the Debtor will be unable to generate income through insurance sales. Therefore, the vehicle is critical to the reorganization. The Debtor has the ability to bring lease payments current and will work with counsel for the Movant to reach an agreement.

WHEREFORE, the Debtor, Gary L. Fleming, Sr., respectfully requests this Honorable Court to deny the Motion for Relief from the Automatic Stay.

Respectfully submitted,

April 4, 2019  
DATE

/s/ Christopher M. Frye  
Christopher M. Frye, Esquire  
Attorney for the Debtor(s)

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